Case 2:16-cv-02829-R-AFM Document 34 Filed 10/07/16 Page 2 of 4 Page ID #:758

Plaintiff RCRV, Inc. d/b/a Rock Revival, and and Defendants Gracing, Inc. d/b/a Grace In LA and Jordan Outdoor Enterprises, Ltd hereby lodge their [Proposed] Stipulated Order to Continue Trial and Pretrial Dates; Declaration of Henry L. Self III (the "[Proposed] Order"). A true and correct copy of the [Proposed] Order is attached hereto. Dated: October 7, 2016 LAVELY & SINGER **Professional Corporation** By: /s/ Henry L. Self III Michael E. Weinsten Henry L. Self III Lindsay D. Molnar 2049 Century Park East, Suite 2400 Los Angeles, CA 90067-2906 Telephone: (310) 556-3615 Counsel for Defendants

DECLARATION OF HENRY L. SELF III

I, Henry L. Self III, declare as follows:

- 1. I am an attorney at law duly licensed to practice before all the courts of this state and am of counsel to the law firm Lavely & Singer Professional Corporation, attorneys for defendants Gracing Inc. d/b/a Grace In LA and Jordan Outdoor Enterprises, Ltd. herein. I have personal and firsthand knowledge of the matters set forth in this declaration and, if called and sworn as a witness, I could and would testify competently thereto under oath.
 - 2. The Complaint in this action was filed on April 25, 2016.
- 3. Defendants initially responded to the Complaint by filing a Rule 12(b)(6) Motion to Dismiss on May 19, 2016.
- 4. On July 13, 2016 the Court issued an Order Setting Trial and Pretrial dates, pursuant to which the trial in this action is currently scheduled to begin on January 3, 2017.
- 5. On July 15, 2016, Plaintiff served initial sets of requests for production and interrogatories on Defendants.
 - 6. The Court denied the Defendants' Motion to Dismiss on July 21, 2016.
- 7. Defendants answered the Complaint and filed Counterclaims on August 3, 2016.
- 8. On August 5, 2016, Defendants served an initial set of requests for production on Plaintiff, and Defendant Gracing, Inc. served an initial set of interrogatories on Plaintiff.
- 9. Defendants served written responses to Plaintiff's initial discovery requests on August 22, 2016.
- 10. Plaintiff answered the Counterclaims on August 23, 2016, such that this action was not fully at issue until that date.
- 11. Plaintiff served written responses to Defendants' initial discovery requests on September 9, 2016.

- 12. The parties recently began exchanging documents and scheduling depositions and have diligently engaged in meet and confer negotiations regarding one another's discovery responses and productions of documents, but anticipate that one or more Motions to Compel may be brought in this action.
- 13. One of Defendants' principal attorneys who is a critical member of their trial team in this action, Lindsay Molnar, is expecting twins in December 2016 and will thereafter be on maternity leave, which will likely preclude her from participating in a January 3, 2017 trial and the preparation therefor.
- 14. No previous continuance, extension of time, or delay of trial has occurred in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7th day of October, 2016, at Los Angeles, California.

ールマモン HENRY L. SELF III